

June 20, 2019

I am continuing to work on this. I will try to send any additional comments prior to the call on Friday.

I am continuing to review the PSD analysis calculations. I have some more comments for you. These comments are on the projected actual calculations.

1 – Paper Machines – the projected actual throughputs for PM2 and the Pulp Dryer are different from those used in the TV calculations. The application stated the maximums throughputs would be used for the paper machines. In the TV renewal, the following was used:

PM2 – 261,643 tons/yr; 716.8 ADTP/day - - used in the c/p app 716.7 ADTP/day

Pulp Dryer – 296,334 ton/yr; 811.9 ADTP/day - - used in the c/p app 811.8 ADTP/day

I understand this is a small difference but why does this change from project to project. Why isn't this consistent?

The maximum throughputs for PM2 and the Pulp Dryer have been corrected to the Title V renewal calculations. The difference is in the Title V permit description the production is rounded to the nearest 100 tons (261,600 and 296,300).

2 – Paper Machine 3 – In this construction application, the throughput for PM 3 was calculated from $2700/0.9 = 3000$ ADTP/day. Should these units be in terms of ODT/day. Usually the 0.9 is the conversion rate from ADTP to ODTP. If the 0.9 does not represent this conversion factor, please explain the derivation of the 3000 ADTP/day.

The PM3 throughput is 2,700 ODTP/day. This was converted to ADTP/day using the conversion $1.0 \text{ ADTP} = 0.9 \text{ ODTP}$. The capacity of PM3 exceeds the Kraft pulp mill capacity of 2,700 ADTP/day (2,430 ODTP/day).

3 – Paper Machines – page D-3 says the particulate factors come from NCASI TB942, Table 5.1. Although the factors in the application are higher, I could not locate the factors on page D-3 in the NCASI TB942, Table 5.1. Where did the particulate factors come from?

Unfortunately TB 942 includes two sets of tables labeled 5.1 – 5.3. The information used comes from the second Table 5.1 on page 45 of TB 942.

4 – NCGs for Unbleached Pulp – the Total HVLC Collection System does not include the two new pieces of equipment – Deshive Refiners and Screw Presses.

The HVLC collection system summation has been corrected to include the Deshive Refiners and the Screw Presses.

5 – Where was the information on page C-9 used?

The NCASI information on page C-9 was not directly used in any final emission calculations. The information was reviewed during early stages of preparing the permit application and is supportive of the assumptions made regarding the reduction in emissions due to the conversion from bleached pulp to unbleached pulp.

I have made it through all the calculations now. Look forward to speaking with you tomorrow.